

Hon. Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN R. BUND II, personally, as Executor of  
the Estate of Richard C. Bund, deceased, S.  
SCOTT JAMES and NOEL L. JAMES, a  
married couple, and on behalf of others  
similarly situated,

Plaintiffs,

vs.

SAFEGUARD PROPERTIES, LLC, a  
Delaware corporation,

Defendant.

No. 2:16-cv-920 MJP

STIPULATED MOTION TO CHANGE  
RESPONSE DEADLINE

(CLERK'S ACTION REQUIRED.)

**NOTED FOR MOTION:  
APRIL 18, 2018**

**I. STIPULATION**

On February 16, 2018, the Court entered an order setting trial date, and setting the deadline to file dispositive cross-motions at April 6, 2018, with a deadline to respond on April 30, 2018. Dkt. # 220. The order states no replies will be filed. *Id.*

During a telephonic hearing on March 27, 2018, the Court granted additional time to file the cross-motions so the parties could address discovery issues. Dkt. # 225. However, the new order did not also change the response deadline stated in the order setting trial date. Dkt. # 220. Because Dkt. # 220 contains the usual language requiring leave of court to change deadlines in the order, the parties jointly request the Court to change the response deadline from April 30, 2018, to May 18, 2018. LCR 7(d)(1); 10(g).

STIPULATED MOTION TO CHANGE RESPONSE  
DEADLINE - 1  
2:16-cv-920 MJP

1 Because the deadline for motions was extended, and the response period contemplated  
2 under the local rules would be severely truncated if the response deadline were not also extended,  
3 good cause exists to extend the deadline for the parties to file responses to the cross-motions.  
4

5 DATED this 18th day of April, 2018.

6 JEFFERS, DANIELSON, SONN &  
7 AYLWARD, P.S.

8 By: /s/ Clay M. Gatens

9 Clay M. Gatens, WSBA No. 34102  
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21 DATED this 18th day of April, 2018.

22 DAUDT LAW PLLC

23 By: /s/ Michael D. Daudt

24 Mr. Michael D. Daudt, WSBA # 25690  
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DATED this 18th day of April, 2018.

1  
2 TERRELL MARSHALL LAW GROUP  
3 PLLC

4 By: /s/ Blythe H. Chandler

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6 Blythe H. Chandler, WSBA No. 43387  
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10 DATED this 18th day of April, 2018.

11 LEE SMART, P.S., INC.

12  
13 By: /s/ Pamela J. DeVet

14 Pamela J. DeVet, WSBA No. 32882  
15 Kellan W. Byrne, WSBA No. 49825  
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20 DATED this 18th day of April, 2018.

21 KIRKLAND & ELLIS LLP

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23 By: /s/ Leonid Feller

24 Leonid Feller, Illinois Bar Number 6274905  
25 Admitted *pro hac vice*  
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Dated this 19th day of April, 2018.

The Honorable Marsha J. Pechman  
United States Senior District Court Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date provided at the signature below, I electronically filed the  
3 preceding document with the Clerk of the Court using the CM/ECF system, which will send  
4 notification of such filing to the following individuals:

5 Mr. Clay Gatens  
6 Ms. Devon A. Gray  
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24 I certify under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct, to the best of my knowledge.

DATED this 18th day of April, 2018 at Seattle, Washington.

LEE SMART, P.S., INC.

By: /s/ Pamela J. DeVet  
Pamela J. DeVet, WSBA No. 32882  
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